DEFENDANT BELMONT VILLAGE, L.P.'S NOTICE OF PENDENCY OF OTHER ACTIONS OR PROCEEDINGS AND REQUEST TO STAY THIS ACTION

Case Name	<u>Court</u>	<u>Parties</u>	Plaintiff's Attorneys
Fatima Goodarzi v. Belmont Village, L.P., et al.	Los Angeles County Superior Court, Case No. 20STCV15572	Plaintiff: Fatima Goodarzi Defendant: Belmont Village, L.P.	Capstone Law APC 1875 Century Park East Suite 1000 Los Angeles, CA 90067 (310)556-4811
Marianita Yadao v. Belmont Village, L.P.	Los Angeles County Superior Court, Case No. 20STCV22064	Plaintiff: Marianita Yadao Defendant: Belmont Village, L.P.	Diversity Law Group PC 515 South Figueroa Street Suite 1250 Los Angeles, CA 90071 (213)488-6555

All three of these matters are putative class action lawsuits in which the plaintiffs are pursuing overlapping claims on behalf of Defendant's non-exempt employees in California for, among other things, unpaid wages, meal and rest period premiums, wage statement penalties, and waiting time penalties. The <u>Goodarzi</u> case was filed on April 22, 2020 in state court and is the first-filed matter. The <u>Yadao</u> case was filed on June 8, 2020 in state court and was filed second. The <u>Bacchus</u> case was filed in state court on February 22, 2022 and was filed third. All three cases were removed from the Los Angeles County Superior Court to the United States District Court for the Central District of California based on the Class Action Fairness Act.

On August 10, 2020, the United States District Court for the Central District of California consolidated the <u>Goodarzi</u> and the <u>Yadao</u> actions for all purposes. On February 23, 2022, the parties in the <u>Goodarzi</u> and the <u>Yadao</u> actions participated in a mediation with experienced employment mediator Jeffrey A. Ross, Esq. At the conclusion of the mediation, the parties negotiated the terms of a complete settlement of the <u>Goodarzi</u> and <u>Yadao</u> class and PAGA claims. As a term of the settlement, the parties agreed to remand the <u>Goodarzi</u> and the <u>Yadao</u> cases to the

Los Angeles Superior Court. The Goodarzi case was remanded on March 29, 2022. The Yadao case was remanded to the Los Angeles Superior Court on April 14, 2022. In light of the foregoing, Defendant respectfully notifies the Court that the Bacchus class action is related to the Goodarzi and the Yadao class actions. DATED: April 26, 2022 LEWIS BRISBOIS BISGAARD & SMITH LLP By: /s/ Kelley M. Fox Jeffrey S. Ranen Daniel D. Spencer Kelley M. Fox Attorneys for Defendant Belmont Village, L.P.

